REMARKS

Claim Rejections - 35 USC §103

At section 3, claims 1-5, 7, 9-16, 18, 20-24, 26, 28 and 29 are rejected under 35 USC §103 as being unpatentable over US patent application publication 2004/0021691, Dostie, et al (hereinafter Dostie), in view of US patent 6,094,197, Buxton, et al (hereinafter Buxton).[1]

With respect to claim 1, it is asserted that Dostie teaches a device for inputting which comprises a display and a memory and that the memory comprises a first set of characters and a second set of characters, wherein the characters in the first set are statistically more likely to be selected in successive order than the characters in the second set of characters. It is further asserted that Dostie does not teach the display which is adapted for selection of which character to input; namely, the first set of characters.

It is further asserted that Buxton teaches a display being adapted to display a first set of characters for selection of which character to input, as well as characters which are not likely to be selected are not displayed in order to save display space. It is then asserted that it would be obvious to one of ordinary skill in the art at the time the invention was made to modify Dostie by having the display adapted to display the first set of characters for selection of which character to input as taught by Buxton in order to provide a way to select characters in an efficient manner and to optimize the screen display. Applicant respectfully disagrees.

The Present Invention

As set forth in the application as filed, the present invention relates to a device for inputting information which comprises a display and a memory, where the memory

[1] Section 3 identifies the rejection under 35 USC §102(e), however, at page 2 and section 2 it is clear that the claim

comprises a first set of characters wherein the first set of characters comprises at least two characters, and a second set of characters, wherein the second set of characters comprises at least two characters, and wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters. The present invention is further directed to wherein the display is adapted to display, for selection of which character to input, the first set of characters.

The Cited Art

Dostie is directed to a method, system and media for entering data in a personal computing device, wherein a user can rapidly enter and search for data using a data entry system by entering one or more characters with a pointing device and by using a search list (Dostie, Abstract and paragraphs [0001] and [0007]).

Buxton is directed to a graphical keyboard on a digital computer, wherein the graphical keyboard responds differently to different types of pen strokes (Buxton, column 1, lines 14-16 and column 3, lines 6-7).

Argument

In addition to the observation by the Office that Dostie does not teach the display being adapted to display, for selection of which character to input, the first set of characters, there are other differences between the present invention as claimed and Dostie. Specifically with reference to Figures 1 and 3 and paragraph [0080] of Dostie, Dostie discloses a display and a memory, wherein the display comprises a keyboard having a plurality of keys . As a user begins entering words or a character sequence, a dictionary within the device of Dostie is searched for what are called "completion candidates" that the user may be attempting to input. A set of potential completion candidates are then displayed (Dostie, paragraph [0082]). It is clear that Dostie, although

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rejection is in fact under 35 USC §103.

discussing the possibility of different characters sets, such character sets being complete alphabets of a written language (such as English, French, German, etc.) or a complete binary-coded character sets (such as American Standard Code for Information Interchange (ASCII), Extended Binary Coded Decimal Interexchange Code (EBCDIC), Binary Coded Decimal (BCD) and Unicode), there is no disclosure or suggestion that there is a first and second character set, wherein each character set comprising at least two characters and wherein the characters of the first character set are statistically more likely to be selected in successive order than the characters in the second set of characters.

In fact, Dostie does not teach dividing the characters disclosed therein into two distinct sets, wherein each set comprises at least two characters. In particular, Dostie does not disclose a memory comprising a first set of characters, wherein the first set of characters comprises at least two characters, and a second set of characters, wherein the second set of characters comprises at least two characters. Rather, Dostie is directed to generating a completion set of characters based upon the user input. Thus, for example, if one was starting with the entry of the letter "q", the completion character set of Dostie would only comprise strings starting with the letters "qu" if the character set is directed to the English language. Hence, the completion candidate set would only comprise the character "u" if the user inputs the character "q". In other words, in this particular example, one set of characters does not comprise at least two characters as required by the present invention as claimed.

In addition, as acknowledged by the Office, the method of Dostie does not comprise displaying, for selection of which character to input, the first set of characters, wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters. As clearly seen in Figures 2a-2c and 3 of the present application, the first set of characters and the second set of characters typically have an equal size. In Dostie, all keys of the

keyboard have the possibility of being displayed in a distinguishing manner (Dostie, paragraph [0064]) and therefore also have the probability of forming only one set of characters. According to the present invention, only a predefined number of characters are associated with the first set of characters and the second set of characters respectively. It is therefore clear that Dostie fails to disclose these features of the present invention as claimed.

The Office goes on to state that it would have been obvious to a person of ordinary skill in the art at the time of the invention to provide the device and method of Dostie with the additional technical features of Buxton so as to arrive at the present invention as claimed.

More specifically, the Office states that Buxton teaches that the display is adapted to display, for selection of which character to input, the first set of characters. Applicant again respectfully disagrees with this assertion.

As argued above, Dostie does not disclose all of the elements and features thereof as set forth in claim 1 of the present application. For example, it does not disclose adapting the display to display, for selection of which character to input, the first set of characters, nor that the first character set has characters that are statistically more likely to be selected in successive order than the characters of a second character set. In addition, a person of ordinary skill in the art at the time of the invention would not find any information regarding how to add these missing features into Dostie in view of Buxton.

More particularly, Buxton relates to a graphical keyboard which responds differently to different types of pen strokes. The Office states that with reference to Figures 7-10 of Buxton, Buxton teaches that characters which are not likely to be selected are not displayed. However, a review of Figures 7-10 of Buxton and the corresponding text (see Buxton, column 5, line 30 through column 7, line 20), it is clear that Figures 7-10 are a series of views showing how a user generates input to the graphical keyboard by use of different types of pen strokes. It should be noted that although these figures do

not show the entire keyboard, this is merely a result of the figures being cropped to better visualize the pen stroke actions of the user when using the invention disclosed in Buxton. The entire keyboard is shown in Figure 1 of Buxton.

It is therefore clear that in contrast to the present invention wherein the characters are dividing into two distinct sets of characters, the keyboards shown in Figures 7-10 of Buxton do not and should not be interpreted as only displaying a selected amount (i.e., a set) of characters. As noted above, the actual keyboard displayed in Buxton is shown in Figure 1 where all of the characters of an alphabet are shown. Thus, the problem as noted by the Office and as mentioned in Buxton at column 2, lines 48-51 concerning a graphical keyboard taking up a large portion of the screen display in part because the keyboard contains many or all of the modifier and function keys, is solved in Buxton by having an improved keyboard that responds differently to different types of pen strokes.

Hence, Buxton teaches away from dividing characters into two sets and, subsequently, only displaying characters in a first set of characters wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters, since, according to Buxton, the user can type certain frequently used keys (such as the space, backspace, delete, and return keys) from anywhere on the keyboard by using special pen strokes (Buxton, column 4, lines 42-46). In Buxton, such frequently used keys are not displayed in a first set of characters while other characters are not displayed. To the contrary, all characters of the alphabet set are displayed (see Figure 1 of Buxton).

In summary, a person of ordinary skill in the art at the time of the present invention starting from Dostie and Buxton would have to additionally undertake at least a number of actions to arrive at the present invention, where such actions are neither likely nor apparent from either of these references taken alone or in combination. In addition, contrary to the position by the Office, applicant respectfully argues that there is nothing in

Dostie in view of Buxton that teaches, suggests or motivates the invention as set forth in claim 1.

In short, to take a display of characters as shown in Dostie and upon user entry of characters as shown on the display making a completion candidate set of the likely remaining characters desired for entry by the user and to add Buxton which shows that a graphical keyboard can respond differently to different types of pen strokes, does not in any way suggest a display and a memory where the memory comprises a first set of characters, the first set of characters comprising at least two characters, and a second set of characters, the second set of characters comprising at least two characters, wherein the characters in the first set of characters are statistically more likely to be selected in successive order than the characters in the second set of characters and wherein the display is adapted to display, for selection of which character to input, the first set of characters.

It is therefore respectfully submitted that claim 1 of the present application is not unpatentable under 35 USC §103 in view of Dostie further in view of Buxton.

Independent method claim 12, independent computer program product claim 21, and independent device claim 29 each recite features similar to those set forth in claim 1 and therefore for reasons argued above with respect to claim 1, each of these independent claims is also believed to be not unpatentable under 35 USC §103 in view of Dostie further in view of Buxton.

Claims 2-5, 7, 9-11, 13-16, 18, 20, 22-24, 26 and 28 are further distinguished over Dostie and Buxton at least in view of their dependency from an independent claim which is believed to be distinguished over said references.

Referring to section 4 of the Official Action, claims 6, 8, 17, 19, 25 and 27 are rejected under 35 USC §103(a) as being unpatentable over Dostie in view of Buxton further in view of US patent 7,152,213, Pu. Each of these claims is also dependent from an independent claim which is believed to be distinguished over the cited art and at least

for this reasons claims 6, 8, 17, 19, 25 and 27 are further believed to be distinguished over the cited art.

In view of the foregoing, it is respectfully submitted that the present application sets forth claims which are believed to be patentable over the cited art and reconsideration of the rejection of the claims is earnestly solicited.

Respectfully submitted,

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